



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DP BARCODE No.:** D455288; **FILE SYMBOL No.:** 91234-ROU; **PRODUCT NAME:** A381.02; **DECISION No.:** 556243; **ACTION CODE:** R301; **FOOD Use:** Yes; **COMPANY:** Atticus, LLC.

**DATE OUT:** January 29, 2020

**SUBJECT:** End Use Product Chemistry Review  
Product Name: A381.02

**FROM:** Kathryn Meyer  
Product Chemistry Team  
CITAB/RD (7505P)

**TO:** Sarah Meadows / Reuben Baris, RM 25, Herbicide / RD (7505P)

**INTRODUCTION:**

The registrant has submitted an application for the registration of the new end use product A381.02. In support of the registration application, the registrant has submitted a CSF for basic formulation (dated October 2<sup>nd</sup>, 2019) and 830 series group A and group B product chemistry data with MRID No. 50944701. CITAB has been asked to determine acceptability of the proposed basic CSF and the supporting product chemistry data and also to determine similarity to the cited product (EPA Reg. No. 62719-367).

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient(s): Acetochlor (70.87%)

2. Has the registrant claimed substantial similarity to a registered product?

☒ Yes; ☐ No; ☐ NA; if yes give the registration number of the cited product.  
EPA Reg. No.62719-367

3. All of the source materials of the active ingredient are derived from registered sources- ☒ Yes ☐ No

4. All inert ingredients have been screened by CITAB (Inert Team) and found to be approved for the proposed label uses - ☒ Yes – approved for food use; ☐ No.

5. Confidential Statement of Formula(s):

☒ Basic – Dated: 10/02/2019

Alternate CSF(s) complies with 40CFR§152.43: ☐ Yes; ☐ No; ☒ NA

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6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2).

☒ Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid Equivalent: ☐ Yes ☒ NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☒ Yes; ☐ No; ☐ NA

Methanol at > 4%: ☐ Yes; ☒ No; ☐ NA

Sodium nitrate/sodium nitrite ☐ Yes; ☒ No; ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes ☐ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

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7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	50944701
830.1600	Description of materials used to produce the product		X		A	50944701
830.1650	Description of formulation process		X		A	50944701
830.1670	Discussion on the formation of impurities		X		A	50944701
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	50944701, Basic CSF dated 10/02/2019
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method <sup>1</sup>		X		A	50944701

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group **B**: Submitted via self-certification dated 10-2-2019

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID/Report Nos.
830.6303	Physical State	Transparent pink (Gardner 12) liquid with a mildly bitter odor	A	N19-877
830.6314	Oxidation/Reduction	Product reacts with potassium permanganate, with a significant temperature change when mixed with KMnO <sub>4</sub>	A	N19-877
830.6315	Flammability	> 110°C	A	N19-877
830.6316	Explosibility	Product does not have explosive characteristics	NA	
830.7000	pH	5.16 (1% dispersion)	A	N19-877
830.7100	Viscosity	45.9 centipoise at 26°C, 21.3 centipoise at 40°C	A	N19-877
830.7300	Density (units)	1.130 g/cm <sup>3</sup> at 26°C, 1.090 g/cm <sup>3</sup> at 40°C	A	N19-877
830.6317	Storage stability Or Accelerated storage stability	Study currently in progress and will be submitted when the data is available	G	
830.6320	Corrosion characteristics or Accelerated corrosion characteristics	Study currently in progress and will be submitted when the data is available	G	

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## CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

### A. Substantial similarity to the cited product (Reg. #62719-367) from Product chemistry view point

☒ Similar

☐ Not similar, give reasons

☐ Identical

☐ Not identical

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☐ Not applicable

**B. Confidential Statement of formula**

1. Basic CSF (dated 10/02/2019)  
☒ Acceptable  
☐ Not Acceptable  
☐ Not Applicable

2. Alternate CSF  
☐ Acceptable  
☐ Not Acceptable  
☒ Not Applicable

**C. Group A Product Chemistry Data**

☒ Acceptable  
☐ Not acceptable  
☐ Acceptable with the exception of Guideline(s):  
☐ Not required  
☐ Data cited; ☐ Acceptable; ☐ Not Acceptable (give reasons)

**D. Group B Product chemistry data**

☐ Acceptable  
☐ Not acceptable  
☒ Acceptable with the exception of Guideline(s): 830.6317, 830.6320  
☐ Not required  
☐ Data cited ; ☐ Acceptable; ☐ Not Acceptable;  
☐ Waiver requests; ☐ Acceptable; ☐ Not Acceptable (give reasons)

**E. Product Label/Draft Label**

Recommendations – Yes ☒; No ☐

If yes, give recommendations below:

Note to PM: Since the product was found to be incompatible with oxidizing agents, the registrant is recommended to add the following statement under Physical-Chemical Hazards on the product label:

“Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur”